

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

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GUOLIANG MA, ELIZABETH PEGUERO,	:
SHARON MANIER, and KIN FAI LAU,	:
on behalf of themselves and others similarly	:
situated,	:
	:
Plaintiffs,	:
	:
-against-	:
	:
HARMLESS HARVEST, INC.,	:
	:
Defendant.	:
	:
-----X	

**PLAINTIFFS' NOTICE OF MOTION FOR APPROVAL OF ATTORNEYS' FEES,
SERVICE FEES, AND REIMBURSEMENT OF EXPENSES**

Named Plaintiffs Guoliang Ma, Elizabeth Peguero, Sharon Manier, and Kin Fai Lau, the Class representatives, hereby give notice of moving the Court for entry of an Order awarding Lee Litigation Group, PLLC, ("Class Counsel"), attorneys' fees and reimbursement of out-of-pocket expenses in the amount of \$555,000.00, to be paid by Defendants from the Escrow Account in accordance with the provisions of Section 10 of the Settlement Agreement. In addition, Plaintiffs respectfully request that the Court grant incentive awards to Plaintiffs Guoliang Ma, Elizabeth Peguero, Sharon Manier, and Kin Fai Lau, the Class representatives, in the total amount of \$20,000, payable as \$5,000.00 per representative, in recognition of their valuable service to the Class.

1. In support of this motion, and as may be required by Federal Rule of Civil Procedure 54(d)(2)(B), Plaintiffs state that Class Counsel are entitled to the award of attorneys' fees and reimbursement of expenses in the amounts represented herein as a result of having created a substantial benefit of the Class.

2. In further support of this motion, Plaintiffs rely upon: (a) the record herein; (b) the Settlement Agreement and General Release and Exhibits thereto; and (c) the accompanying Memorandum of Law in Support of Plaintiffs' Motion for Approval of Attorneys' Fees, Service Fees, and Reimbursement of Expenses.

3. In addition to the instant Motion for award of attorneys' fees, expenses, and incentive awards, a Final Approval Motion will be submitted, as set forth in the Court's Order Preliminarily Certifying Settlement Class, Approving Class Settlement, Approving Class Notice and Setting Date for Fairness Hearing dated May 12, 2017, by October 20, 2017. As part of a final resolution of this litigation, Plaintiffs respectfully request that the Court grant the requests made in the instant Motion and as well as in the subsequently filed Final Approval Motion.

4. Pursuant to the Court's Order Preliminarily Certifying Settlement Class, Approving Class Settlement, Approving Class Notice and Setting Date for Fairness Hearing dated May 12, 2017, Plaintiffs may supplement the instant motion regarding attorneys' fees and incentive awards if necessary, to respond to any objections, prior to the fairness hearing.

WHEREFORE, for the reasons stated in the instant Motion and accompanying Memorandum of Law in Support, Plaintiffs respectfully request that the Court approve the attorneys' fees, reimbursement of expenses and service awards requested. For the Court's convenience, a proposed Order has been provided as Exhibit A.

Respectfully submitted this 9th day of June, 2017

LEE LITIGATION GROUP, PLLC

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